



AFFIDAVIT OF COACH PAT HEAD SUMMITT

STATE OF TENNESSEE)
) ss:
COUNTY OF KNOX)

COMES NOW Pat Head Summitt, who being sworn, and states she has personal knowledge of the following:

1. My name is Pat Head Summitt. I reside at

I am over the age of eighteen (18), and I have personal knowledge of the facts stated in this Affidavit.

2. I am the former Head Coach of the University of Tennessee Lady Vol Basketball Team, and I am currently Head Coach Emeritus. I coached at the University of Tennessee from 1974 to 2012.
3. During my employment, I worked with Debby Jennings from 1977-2012. Debby Jennings was a loyal employee of the University of Tennessee, a tireless worker, and a great ambassador for U.T. To my knowledge, she was very competent in the various jobs she performed for U.T. and was one of the most decorated and honored women in collegiate athletic media relations. She was a trusted employee after working side-by-side for 35 years. During her employment, Debby Jennings was a strong advocate for the University of Tennessee women's athletics department but women's athletics in general as well as Title IX. She was instrumental in helping to develop the Lady Vol brand into the positive national symbol of excellence in intercollegiate athletics that it has become. The

Lady Vol logo is known worldwide. During her employment, I saw a driven and dedicated employee and never knew her to be insubordinate to me or anyone else. During her employment, Debby was not afraid to speak her mind and that was one of her strengths as an employee. Prior to Debby Jennings' termination, I was not consulted by Dave Hart, the UT Athletics Director. But had I been consulted, I would have requested that he reconsider termination, and try another alternative, such as disciplinary action, if he felt that was necessary. In the year prior to Debby Jennings' termination, Debby did inform me that she had lodged a gender and age complaint to her supervisors Chris Fuller and Jimmy Stanton regarding her treatment.

4. On February 15, 2012, I had a meeting with Dave Hart. I requested the meeting to talk to Dave Hart because I heard he wanted to discontinue using the Lady Vol logo. In that meeting, he told me he intended to place all UT women's and men's athletics teams under the "power T" so they would be "all Volunteers." I was angered when he came out in an interview with the media in May 2012 and denied that he ever intended to do away with the Lady Vol logo.
5. On March 14, 2012, I had another meeting with Dave Hart. The meeting took place prior to our team traveling to Chicago, Ill., for the NCAA tournament. During this one-on-one meeting, Dave Hart indicated to me that I would not be coaching the Lady Vol Basketball Team in the next school year (2012-13) and he planned to name Holly Warlick as the head coach. Dave Hart told me I would still have an office in Thompson-Boling Arena and my title could be Head Coach Emeritus. This was very surprising to me and very hurtful as that was a decision I would have liked to have made on my own at the end of the season after

consulting with my family, doctors, colleagues, and friends and not be told this by Mr. Hart. I felt this was wrong.

6. Following the conversation with Mr. Hart, I was very upset and shortly after my meeting with Mr. Hart, I told several people about Mr. Hart's decision, including, Debby Jennings.
7. Unbeknownst to the individuals I shared this upsetting news, Dave Hart spoke with me again, subsequent to the March 14, 2012, one-on-one meeting, and indicated that I misinterpreted what he said.

FURTHER THE AFFIANT SAITH NAUGHT.

Patricia Head Summitt
PATRICIA HEAD SUMMITT

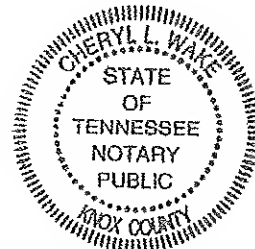
WITNESS

Latina Haynes
Print name

Latina Haynes
Signature

STATE OF TENNESSEE)
COUNTY OF KNOX } ss:

Sworn to and subscribed before me this
the 10 day of August, 2012.



Cheryl L. Wake
NOTARY PUBLIC
My Commission Expires: April 29, 2015